#### **CASE NO. 25-11929-AA**

# IN THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

# ALEXANDER CARTWRIGHT, MICHAEL JOHNSON, NANCY MYERS, AND TOSHA DUPRAS, Defendants/Appellants,

v.

# CHARLES NEGY, Plaintiff/Appellee.

# ON APPEAL FROM THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA District Court Case No. 6:23-CV-00666-CEM-DCI

# APPELLANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIF

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# CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT

Pursuant to 11th Cir. R. 26.1-1(a), Defendants/Appellants Alexander Cartwright, Michael Johnson, Tosha Dupras, and Nancy Myers provide the following list of all trial judges, attorneys, persons, associations of persons, firms, partnerships, or corporations that have an interest in the outcome of this case or appeal, and other identifiable legal entities related to a party. There are no subsidiaries, conglomerates, affiliates, parent corporations, or any publicly held corporation that own 10% or more of a party's stock as there are no corporate parties to this action.

- 1. Allen Harris Law—Attorneys for Plaintiff/Appellee;
- 2. Barry, Richard L.—Attorney for Defendants/Appellants;
- 3. Butler, S. Kent—Defendant;
- 4. Cartwright, Alexander—Defendant/Appellant;
- 5. Dupras, Tosha—Defendant/Appellant;
- 6. Engel, Joshua A.—Attorney for Plaintiff/Appellee;
- 7. Engel & Martin, LLC—Attorneys for Plaintiff/Appellee;
- 8. Goldstein Law Partners, LLC—Attorneys for Plaintiff/Appellee;
- 9. GrayRobinson, P.A.—Attorneys for Defendants/Appellants;
- 10. Harris, Samantha—Attorney for Plaintiff/Appellee;
- 11. Hatcher-Bolin, Kristie—Attorney for Defendants/Appellants;

- 12. Irick, Daniel C. United States Magistrate Judge, Middle District of Florida, Orlando Division;
- 13. Johnson, Michael—Defendant/Appellant;
- 14. Katz, Katherine W.—Attorney for Defendants/Appellants;
- 15. Lauten, Jr., Frederick James—Mediator;
- 16. Mendoza, Carlos E.—United States District Judge, Middle District of Florida, Orlando Division;
- 17. Myers, Nancy—Defendant/Appellant;
- 18. Negy, Charles—Plaintiff/Appellee;
- 19. Osborne, David R.—Attorney for Plaintiff/Appellee;
- 20. Spradley, Susan T.—Former Attorney for Defendants/Appellants;
- 21. The University of Central Florida Board of Trustees—Defendant;
- 22. Zimmerman, Jason—Former Attorney for Defendants/Appellants;
- 23. Zolty, Julie M.—Attorney for Defendants/Appellants.

### APPELLANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Appellants Alexander Cartwright, Tosha Dupras, Michael Johnson, and Nancy Myers, pursuant to 11th Cir. R. 31-2, respectfully request that the Court enter an order extending the time to file their Reply Brief for 30 days, through and including Thursday, January 15, 2026, and in support state:

- 1. Appellants' Reply brief is currently due Tuesday, December 16, 2025.
- 2. Counsel for Appellants respectfully request a 30-day extension of time to complete and file their reply brief due to ongoing medical treatments that have impacted one of their appellate attorneys, Kristie Hatcher-Bolin, as well as multiple deadlines counsel of record have, as set forth below, including but not limited to:
  - (a) preparation and filing of Pretrial Witness List Disclosure in *Crane Creek Landing Townhome Homeowners Association, Inc. v. Crane Creek Landings, LLC, et al.* Brevard County Case # 052024CA035726 (December 5, 2025);
  - (b) preparation and filing of Expert Witness Disclosure in *MQMF Lake House Orlando, LLC v. Finfrock Construction, LLC, et al.* Orange County Case No. 2024CA009998-O (December 8, 2025);
  - (c) preparation for and attendance at final hearing in *Reyes v. Florida*A&M University, Division of Administrative Hearings Case No. 25-5103

    (December 10, 2025);

- (b) preparation for and attendance at mediation in *Huber v. McDonald*, Fifth Judicial Circuit Case No. 2020-CA-0406 (December 11, 2025);
- (c) preparation for and attendance at mediation in *Bachelier v. Florida*Association of Healthy Start Coalitions, Inc., Case No. 5:25-cv-28-TKW
  MJF (N.D. Fla.) (December 15, 2025);
- (d) preparation for and attendance at hearing in *Bailey v. Broward County*, *et al.*, Broward County Case #22-001407 (December 18-19);
- (e) preparation for and attendance at Pretrial Conferences in *Diaz v*. *Herring, et al.*, Hillsborough County Case #23-CA-007135 and *Boffeli v*. *Citizens Prop. Ins. Corp.*, Hillsborough County Case #2024-CA-006765 (January 7, 2026);
- (f) preparation for and attendance at Pretrial Mediation in *Crane Creek Landing Townhome Homeowners Association, Inc. v. Crane Creek Landings, LLC, et al.*, Brevard County Case No 052024CA035726 (January 8, 2026);
- (g) preparation and filing of Pretrial Witness List Disclosure, *MQMF Lake House Orlando, LLC v. Finfrock Construction, LLC, et al.*, Orange County, Case No. 2024-CA-009998-O (January 16, 2026);
- 3. Additionally, Kristie Hatcher-Bolin, who has been Appellants' counsel since the outset of the District Court case and is overseeing the briefing for Appellants, continues to undergo treatment, now on a weekly basis, for a significant medical condition, which has impacted her ability to timely prepare and finalize

drafts for Appellants' review before filing. Further, due to their positions as university administrators, some Appellants (Tosha Dupras and Nancy Myers) are traveling both for personal and work-related reasons during the upcoming winter break and would require additional time to review the drafts prepared.

4. This extension is sought in good faith and not to improperly delay this proceeding. Granting this request will not prejudice any party, and the undersigned has contacted Samantha Harris, Esquire, counsel for Appellee, Charles Negy, who graciously consented to the 30-day extension requested in this motion.

WHEREFORE, Appellants respectfully request the Court enter an order extending the time for Appellants to file their Reply Brief by 30 days, through and including Thursday, January 15, 2026.

# CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMIT, TYPEFACE REQUIREMENTS, AND TYPE-STYLE REQUIREMENTS

- This document complies with the type-volume limit of Fed. R. App. P.
   27(d)(2)(A) because, excluding the parts of the document exempted by Fed. R. App.
   P. 32(f): this document contains 528 words.
- 2. This document complies with the typeface and style requirements of Fed. R. App. P. 27(d)(1)(E) because: this document has been prepared in a proportionally spaced typeface in 14-point Times New Roman font.

/s/ Kristie Hatcher-Bolin KRISTIE HATCHER-BOLIN Florida Bar No. 521388

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was filed with the Clerk of Court using the CM/ECF system this 5<sup>th</sup> day of December 2025, which will serve a copy on all counsel of record listed below:

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